

EXHIBIT B

Maureen T. Bass, Esq.
Partner
mbass@abramslaw.com

June 29, 2021

VIA: FIRST CLASS MAIL

Jeffrey L. Calabrese, Esq.
Harter Secrest & Emery LLP
1600 Bausch and Lomb Place
Rochester, New York 14604

Steven E. Cole, Esq.
Adams LeClair LLP
28 E. Main Street, Suite 1500
Rochester, New York 14614

Re: Michael Donoghue and Premium Mortgage Corp. v. Cynthia Nostro, Dylan Randall, David Popham and Everett Financial, Inc. d/b/a Supreme Lending
Case No.: 6:20-CV-06100-EAW

Dear Counsel:

Plaintiffs served discovery demands on Defendants on October 30, 2020. I understood from previous conversations that your offices were working on responses to those demands, and they would have already been served.

In order to stay in compliance with the scheduling orders, we will need your clients' responses as soon as possible, and in any event, no later than July 19, 2021. Additionally, we would like to schedule some of the tentative dates for deposition in August, as they may require travel arrangements to Texas. After receiving your responses, we will promptly serve our clients' responses.

Please let me know if we need to discuss.

Very truly yours,

Maureen T. Bass

MTB/ajf